



South Coast Air Quality Management District

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February 24, 2006

Mr. Safouh Sayed
Department of Toxic Substance Control
5796 Corporate Avenue
Cypress, CA 90630

Dear Mr. Sayed:

Notice of Preparation of a Draft Environmental Impact Report for Pier A West/Area 2 Remediation

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft Environmental Impact Report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. In addition, please send with the Draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files.

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2002 Model. This model is available on the SCAQMD Website at: www.aqmd.gov/ceqa/models.html.

When preparing the Draft EIR, the lead agency must identify any potential adverse air quality impacts that could occur from all phases of the project, including overlapping phases, and all air pollutant sources related to the project. Air quality impacts from both construction and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

Consistent with the SCAQMD's environmental justice enhancement I-4, in October 2003, the SCAQMD Governing Board adopted a methodology for calculating localized air quality impacts and localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second

indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, the SCAQMD requests that the lead agency perform a localized air quality impact analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

The lead agency must conduct a thorough health risk assessment to quantify the potential health risks from sources associated with the proposed project's remediation activities. This analysis should include all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants.

According to the project description, contaminated soil may be excavated and transported off-site. Based on the potential that the proposed project may generate or attract vehicular trips, especially heavy-duty diesel-fueled vehicles, the lead agency must also perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA webpages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. The lead agency must require implementation of feasible mitigation measures by all applicable sources unless substantial evidence supports a finding that implementation of a measure is not feasible. In such a case, the measure must be implemented to the extent feasible. Lead agencies may not approve projects as proposed if there are feasible alternatives or mitigation measures available which would substantially lessen the significant environmental impacts of the project. (Pub. Res. Code §21002). Also, an EIR must respond to the specific suggestions for mitigating a significant environmental impact unless the suggested mitigation is facially infeasible. (Los Angeles Unified School District v. City of Los Angeles (1997) 58 Cal. App. 4th 1019, 1029). The Lead Agency must utilize all tools available to implement mitigation measures including, but not limited to, permits and lease agreements.

To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>.

Some specific mitigation measures for the lead agency's consideration include, but are not limited to the following.

Harbor Craft: If harbor craft are used for any portions of the proposed project, the lead agency should require the following:

- Retrofit existing harbor craft with diesel particulate filters (DPF), diesel oxidation catalysts (DOC), and SCR; and
- Full use of shore-side power for harbor craft.

Heavy Duty Trucks: For heavy-duty trucks associated with the project, including heavy-duty trucks hauling contaminated soil, the lead agency should require the following:

- Require all trucks to meet or exceed the 2007 on-road heavy-duty truck standards for NOx and PM through one of the following approaches:
 - Use of trucks that meet the 2007 emission standard; or
 - Retrofit existing trucks with DPF (PM) and retrofit heavy-duty diesel vehicle with NOx catalysts (NOx); or
 - Use of alternative fuels such as LNG.
- Require use of electrified truck spaces for all truck parking or queuing areas; and
- Implement stricter truck idling measures

Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD is willing to work with the lead agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development and Area Sources

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LAC060126-02LI
Control Number